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Attorneys for Defendant
COLE HAAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TAMMIE DAVIS, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Consolidated Case No. 11-cv-01826-JSW

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING TIME ON DEADLINES
AND DATES RELATED TO PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

Hon. Jeffrey S. White
Courtroom 11, 19th Floor

STEFANI CONCEPCION, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 11-cv-02187-JSW

Pursuant to L.R. 6-2, counsel for Defendant Cole Haan and counsel for Plaintiffs (collectively, the “Parties”) stipulate as follows:

WHEREAS, the deadlines for the class certification motions, fact and expert discovery cutoffs and motions for summary judgment are as follows:

Deadline/Event	Current Dates (If Any)
Motion for Class Certification is due	April 23, 2012
Opposition to Plaintiffs’ Motion for Class Certification is due	14 days after the date the Motion is filed
Reply in support of the Motion for Class Certification is due	7 days after the Opposition is filed
Hearing on Plaintiffs’ Motion for Class Certification	Not yet scheduled
Close of fact discovery	May 11, 2012
Close of expert discovery	June 11, 2012
The first party’s opening motion for summary judgment is due	June 22, 2012
The second party’s opposition and cross-motion for summary judgment is due	July 6, 2012
The reply and opposition to the cross-motion for summary judgment is due	July 20, 2012
The second party’s reply in support of the cross-motion for summary judgment is due	July 27, 2012
The last day for the Court to hear dispositive motions	August 17, 2012

WHEREAS, the parties have been engaged in mediation and post-mediation discussions, and have scheduled a further telephonic conference with Judge Infante, the mediator, for the week of April 9, 2012;

WHEREAS, Plaintiff Concepcion is pregnant and due to give birth very soon, which will limit her availability for deposition before the scheduled close of fact discovery on May 11, 2012;

WHEREAS, there have been no previous time modifications, whether by stipulation or Court Order;

WHEREAS, pursuant to such agreement, the Parties hereby seek an Order from the Court vacating the above-referenced dates, and re-setting the deadlines and dates relating to class certification, fact and expert discovery, and the motions for summary judgment as specified below;

Now, therefore, the Parties stipulate and respectfully request that the Court order to re-set the deadlines and dates as follows:

Deadline/Event	Proposed Dates
Motion for Class Certification is due	June 18, 2012
Opposition to Plaintiffs' Motion for Class Certification is due	July 10, 2012
Reply in support of the Motion for Class Certification is due	July 24, 2012
Hearing on Plaintiffs' Motion for Class Certification	August 31, 2012
Close of fact discovery	June 29, 2012
Close of expert discovery	July 30, 2012
The first party's opening motion for summary judgment is due	August 10, 2012
The second party's opposition and cross-motion for summary judgment is due	August 24, 2012
The reply and opposition to the cross-motion for summary judgment is due	September 11, 2012
The second party's reply in support of the	September 18, 2012

1	cross-motion for summary judgment is due	
2	The last day for the Court to hear dispositive	October 12, 2012
3	motions	

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5 **IT IS SO STIPULATED.**

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7 Dated: April 6, 2012

8 COOLEY LLP
 9 MICHELLE C. DOOLIN
 10 JENNIFER M. FRENCH
 11 BEATRIZ MEJIA
 12 MATTHEW M. BROWN

13 /s/ Matthew M. Brown

14 Matthew M. Brown
 15 Attorneys for Defendants
 16 COLE HAAN

17 Dated: April 6, 2012

18 PATTERSON LAW GROUP, APC
 19 JAMES R. PATTERSON (211102)

20 /s/ James R. Patterson

21 James R. Patterson

22 Attorneys for Plaintiff
 23 TAMMIE DAVIS

24 Dated: April 6, 2012

25 STONEBARGER LAW, APC
 26 GENE J. STONEBARGER (209461)
 27 RICHARD D. LAMBERT (251148)

28 /s/ Gene J. Stonebarger

Gene J. Stonebarger

Attorneys for Plaintiff
 STEFANI CONCEPCION

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this document.

Dated: April 6, 2012

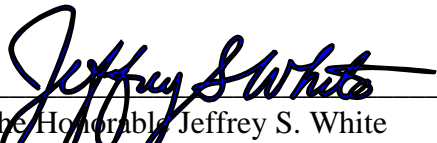
COOLEY LLP

/s/ Matthew M. Brown
Matthew M. Brown

Attorneys for Defendants
COLE HAAN

IT IS SO ORDERED/ AS MODIFIED ABOVE.

Dated: April 9, 2012


The Honorable Jeffrey S. White
United States District Judge

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